

EXHIBIT I

Declaration of
Deputy Director Harold
Wickham

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1 AARON D. FORD
Nevada Attorney General
2 D. RANDALL GILMER (Bar No. 14001)
Chief Deputy Attorney General
3 State of Nevada
Office of the Attorney General
4 555 East Washington Avenue, Suite 3900
Las Vegas, NV 89101
5 (702) 486-3427 (phone)
(702) 486-3773 (fax)
6 drgilmer@ag.nv.gov
Specially Appearing as
7 *Attorneys for Warden Howell*

8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

10 MARCELL WILLIAMS,

11 Plaintiff,

12 vs.

13 WARDEN OF SOUTHERN DESERT
CORRECTIONAL CENTER, et al.,

14 Defendants.

CASE NO. 2:20-cv-00639-RFB-BNW

**DECLARATION OF DEPUTY
DIRECTOR, HAROLD WICKHAM**

15 I, Harold Wickham, hereby declare based on personal knowledge and/or information
16 and belief, that the following assertions are true.

17 1. I am currently employed as the Deputy Director of Operations for the Nevada
18 Department of Corrections (NDOC). As Deputy Director of Operations, I am responsible for
19 assisting Director Daniels with all aspects of NDOC Operations. These duties include
20 enforcement of oversight of all policy directives that would have an impact on the smooth,
21 safe, and secure operations of the NDOC.

22 2. To ensure the safety and security of all NDOC institutions, it is critical that I
23 work closely with NDOC's Medical Director, as the health and welfare of the inmates and
24 staff of NDOC are paramount to successful, safe, and secure operations. This coordination
25 with Dr. Minev has become even more important during the quickly evolving COVID-19
26 pandemic that has engulfed the world.

27 3. While Dr. Minev oversees the medical components of the preventive protocols
28 put in place in NDOC's fight against COVID-19, I assist him in this regard by requiring

1 the wardens at each institution ensure that Dr. Minev's recommendations are followed. In
2 short, these recommendations and preventive protocols are not discretionary, but
3 mandatory.

4 4. To assist with the mandatory requirements put forth to limit the spread of
5 COVID-19, I authored and ordered dissemination to all staff a memorandum dated March
6 16, 2020. Chief Deputy Attorney General D. Randall Gilmer has informed me that a copy
7 of the March 16, 2020 memorandum will be provided to this Court as part of the filing that
8 will also include this declaration. I have had an opportunity to review the March 16, 2020
9 memorandum with the affixed bates-label, NDOC-COVID00017, and I attest that it is a
10 true and accurate copy of the memorandum I authored in my official capacity as Deputy
11 Director of Operations.

12 5. To further combat and guard against the COVID-19 pandemic, as of April 8,
13 2020, NDOC has taken the unprecedented step of providing hand sanitizer to all inmates
14 free of charge. This sanitizer is over and above the other personal hygiene and sanitization
15 items provide and available to the inmates.

16 6. I declare under penalty of perjury pursuant to 28 U.S.C. section 1746 that the
17 foregoing is true and correct.

18 EXECUTED this 8th day of April, 2020

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20 
21 HAROLD WICKHAM
22 Deputy Director of Operations,
23 Nevada Department of Corrections
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